From: Jay Field

Eric Blischke/R10/USEPA/US@EPA To:

Chip Humphrey/R10/USEPA/US@EPA; Robert.Neely@noaa.gov; Ron Gouguet Cc:

Subject: Re: NOAA draft comments on benthic approach report

Date: 07/03/2006 03:39 PM

Attachments: EPAPredictiveModelCommentsCover070606 if.doc

PH LWG FPM predictions 060630.pdf PH NOAA PMax predictions 060630.pdf

Eric, Attached is an edited version of your letter. When both approaches are applied to the entire chemistry data set (Category 1 data), agreement between the approaches in classifying samples as low or moderate-high probability of toxicity is >80%. I've also attached 2 pdfs (one for NOAA pmax model and one for LWG FPM) of the approaches applied to the entire chemistry data set (n=1530). Comparing the two figures, it appears that both approaches are identifying the same geographic areas with low and high probability of toxicity. I'm not sure we should expect much more from the models.

Please call if you need additional information. Jav

Blischke.Eric@epamail.epa.gov wrote:
> Jay, attached is a draft cover letter. I have included three bullets
> about how to move forward in the Round 2 Report. They do not match up
> exactly with what you have provided below but hopefully capture what we
> want. Look this over, add any general statements you would like to make
> and send me your comments.

> Thanks, Eric

> (See attached file: EPAPredictiveModelCommentsCover070606.doc)

Jay Field <Jay.Field@noaa.

gov>

07/03/2006 12:30 РM

Robert.Neelv@noaa.gov

Eric Blischke/R10/USEPA/US@EPA, Chip Humphrey/R10/USEPA/US@EPA, Ron Gouguet

<Ron.Gouguet@noaa.gov>

Subject

Re: NOAA draft comments on benthic approach report

> Rob/Chip/Eric.

Rob's quick summary intro section is not entirely consistent with our discussion in Centralia. I've included a revised version below. Pleacall me if you have any questions. > thanks.

> In short, our primary concerns are as follows:

- The proposed threshold numbers for Total PAH as derived from the Floating Percentile Model (FPM) are patently unacceptable and should be discarded. Values for PAHs should be based on NOAA's Logistic Regression Model (LRM) or freshwater consensus PECs (MacDonald, D. D., C. G. Ingersoll, et al. 2000).
- > 2) NOAA'S LRMs for Hyalella growth and survival (pooled) Level 2 should > be used as an additional interpretive tool. A preliminary analysis of > the results of both models suggests significant overlap in results (i.e., in the delineation of areas of no-risk vs. risk) which may help > to focus additional lines of evidence on areas where modeled risk to > benthos is uncertain. Results of both the FPM and LRM should be carried forward
 - 3) The results for the Hyalella growth and survival endpoint should be included in the identification potential areas of concern.

Robert.Neely wrote: Hey Eric,

Jay's email was restored. I've made some slight editorial changes to his comments and added an introductory section which neither he nor Ron have seen, but it attempts to lay out the three key issues (as we discussed). I'm submitting these comments to you and Chip for the moment as draft in the event Ron and/or Jay and/or you and Chip have any additional thoughts or questions. I'll hold on a broader circulation until sometime next week.